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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TYLER MILLER, an individual,

Plaintiff,

vs.

Case No. 3:23-cv-00293-SI

UNOPPOSED MOTION FOR LEAVE TO
FILE FIRST AMENDED COMPLAINT

HENRY HEIMULLER, in his official capacity
as Board Member of the Columbia 9-1-1
Communications District; BRUCE HOLSEY,
in his official capacity as Board Member of the
Columbia 9-1-1 Communications District;
JEFF FLATT, in his official capacity as Board
Member of the Columbia 9-1-1
Communications District; and SHELLEY
HENNESSY, in her official capacity as Board
Member of the Columbia 9-1-1
Communications District,

Defendants.

LR 7-1 CERTIFICATION

Plaintiff's counsel certifies that he conferred with Defendants' counsel and the motion is
unopposed.

MOTION AND MEMORANDUM

Pursuant to Fed. R. Civ. P. 15(a), Plaintiff moves the Court for leave to file a First Amended Complaint. Pursuant to Civil Local Rules 15-1, Plaintiff has attached to this motion a comparison of the proposed First Amended Complaint to the initial Complaint.

Permitting the filing of the proposed First Amended Complaint will not affect any deadlines in this case as the Court has not yet entered a pretrial scheduling order. Amendment would not prejudice Defendants, both because the Court has not yet entered a scheduling order and because the claims that Plaintiff proposes to add are ones that Plaintiff has raised during prior motions practice.

For these reasons, Plaintiff respectfully requests that he be granted leave to file a First Amended Complaint reflecting the changes shown in Exhibit 1.

DATED this 28th day of June, 2023.

SNELL & WILMER L.L.P.

s/ Clifford S. Davidson

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